

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

MISSISSIPPI STATE CONFERENCE OF  
THE NATIONAL ASSOCIATION FOR  
THE ADVANCEMENT OF COLORED  
PEOPLE; DR. ANDREA WESLEY; DR.  
JOSEPH WESLEY; ROBERT EVANS;  
GARY FREDERICKS; PAMELA  
HAMNER; BARBARA FINN; OTHO  
BARNES; SHIRLINDA ROBERTSON;  
SANDRA SMITH; DEBORAH HULITT;  
RODESTA TUMBLIN; DR. KIA JONES;  
MARCELEAN ARRINGTON; VICTORIA  
ROBERTSON,

*Plaintiffs,*

v.

STATE BOARD OF ELECTION  
COMMISSIONERS; TATE REEVES, *in his  
official capacity as Governor of Mississippi*;  
LYNN FITCH, *in her official capacity as  
Attorney General of Mississippi*; MICHAEL  
WATSON, *in his official capacity as  
Secretary of State of Mississippi*,

*Defendants,*

AND

MISSISSIPPI REPUBLICAN EXECUTIVE  
COMMITTEE

*Intervenor-Defendant.*

No. 3:22-cv-734-DPJ-HSO-LHS

**PLAINTIFFS' NOTICE OF INTENT TO SERVE SUBPOENA FOR DEPOSITION**

YOU ARE HEREBY NOTIFIED, pursuant to Rule 45 of the Federal Rules of Civil Procedure,  
that Plaintiffs intend to serve a subpoena for deposition upon Madalan Lennep.

A copy of the subpoena is attached hereto as Exhibit “A.”

*[Signature Page Follows]*

Dated: November 20, 2023

/s/ Joshua Tom

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I, Joshua Tom, do hereby certify that I have this day electronically filed the foregoing document with the Clerk of the Court using the ECF system, which sent notification of such filing to all counsel of record.

This the 20th day of November, 2023.

/s/ Joshua Tom  
Joshua Tom

## UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

MS State Conf. of NAACP, et al.,

*Plaintiff*

v.

State Bc. of Election Commissioners, et al.,

*Defendant*

Civil Action No. 3:22-cv-734-DPJ-HSO-LHS

## SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

Madalan Lennep, Elections Consultant for the Mississippi Secretary of State

*(Name of person to whom this subpoena is directed)*

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place: Mississippi Attorney General's Office  
550 High Street, Suite 1100, Jackson, MS 39205

Date and Time:  
12/18/2023 9:00 am

The deposition will be recorded by this method: Veritext stenographer and videographer


☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 11/20/2023

CLERK OF COURT

OR

*Signature of Clerk or Deputy Clerk**Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* MS State Conf. of NAACP, et al., who issues or requests this subpoena, are:

Joshua Tom, 101 South Congress St., Jackson, MS 39201, jtom@aclu-ms.org, (601) 354-3408

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 3:22-cv-734-DPJ-HSO-LHS

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named individual as follows: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.: